

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**PLAINTIFFS' UNOPPOSED JOINT MOTION FOR EXTENSION
AND LEAVE TO FILE REPLY IN EXCESS OF FIFTEEN PAGES**

Pursuant to Local Rule 7.1(D), Plaintiffs respectfully request a short extension and leave to file additional pages—not to exceed thirty (30) pages—for their Reply in Support of their Joint Motion for Sanctions (Dkt. No. 623). State Defendants do not oppose this motion.

State Defendants filed a thirty-nine (39) page Response in Opposition to Plaintiffs' Joint Motion for Sanctions (Dkt. No. 647). That Response includes a 13-page "Factual Background" that Plaintiffs must respond to for the Court to have a correct and complete recitation of the material facts, as well as numerous criticisms of Plaintiffs' specific fees and costs sought in the Motion, which Plaintiffs must also address. Thus, a Reply in excess of the fifteen (15) pages provided by Local Rule 7.1(D), but not to exceed thirty (30) pages, is necessary in

order to properly and fully respond to the arguments and allegations in State Defendants' Response.

Moreover, given the length of State Defendants' Response and other commitments Plaintiffs and their counsel bear (including briefing on State Defendants' Motions to Dismiss (Dkt. Nos. 650, 651), to which Plaintiffs just responded on November 4), Plaintiffs require a brief extension to ensure adequate time to fully address State Defendants' arguments and allegations. Accordingly, Plaintiffs request an extension until November 12, 2019, for their Reply.

A proposed order is attached.

Dated: November 6, 2019

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2019 a copy of the foregoing **PLAINTIFFS' UNOPPOSED JOINT MOTION FOR EXTENSION AND LEAVE TO FILE REPLY IN EXCESS OF FIFTEEN PAGES** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross